

BELL, MCANDREWS & HILTACHK  
ATTORNEYS AND COUNSELORS AT LAW  
455 CAPITOL MALL, SUITE 801  
RACIALMENTO, CALIFORNIA 95814

REC'D  
FEDERAL ELECTIONS  
COMMISSION  
**FAXED**  
MAR 24 12:51 PM '98

CHARLES H. BELL, JR.  
COLLEEN C. MCANDREWS  
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March 16, 1998

BY FACSIMILE AND U.S. MAIL

Mr. Neal Evans  
Reports Analyst  
Reports Analysis Division  
Federal Elections Commission  
999 E Street, N.W.  
Washington DC 20463

Re: Your Letter of February 25, 1998.  
to Susan Limon, Treasurer  
Tenet Healthcare Corporation PAC  
No. C00119354 (Year End Report 12/31/97)

Dear Mr. Evans:

This letter is sent on behalf of Susan Limon, Treasurer, and the Tenet Healthcare Corporation Political Action Committee in response to your above-referenced letter.

The committee is filing an amendment with respect to the first item on the preliminary review letter.

This is to respond further to the item concerning possible violation of 2 U.S.C. § 441a(a). This is to confirm that the committee had responded to a similar inquiry last year and had received no response indicating that the explanation given was inadequate, and had, justifiably, believed that response and explanation had been accepted.

We now understand that another Reports Analyst for the recipient, Federation of American Health Systems PAC, may have received approval for the transaction, as explained by that PAC (Copy of Letter attached.)

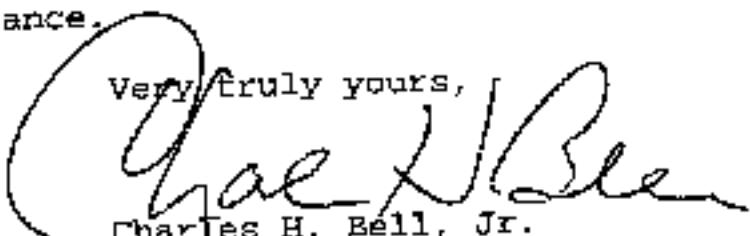
CONFIDENTIAL ATTORNEY-CLIENT PRIVILEGE

Letter to Mr. Neal Evans  
Reports Analyst  
Reports Analysis Division  
Federal Elections Commission  
March 16, 1998  
Page 2

If your office has concluded that Federation of American Health Systems PAC's response is satisfactory, please advise us. If not, we will respond further to your inquiry.

Thank you for your assistance.

Very truly yours,

  
Charles H. Bell, Jr.

CHB:1js  
1015.01

Attachment

## FOLEY &amp; LARDNER

ATTORNEYS AT LAW

CHICAGO  
JACKSONVILLE  
LOS ANGELES  
MADISON  
MILWAUKEE  
ORLANDO  
SACRAMENTO  
SAN DIEGO

2029 CENTURY PARK EAST, 35TH FLOOR  
LOS ANGELES, CALIFORNIA 90067-3021  
TELEPHONE (310) 277-2223  
FACSIMILE (310) 277-8675

WHITEAU'S DIRECT LINE

(310) 275-7733

SAN FRANCISCO  
TALLAHASSEE  
TAMPA  
WASHINGTON D.C.  
WEST PALM BEACH

LEON FOLEY (1814-1978)  
LYNWOOD LARDNER, JR. (1915-1973)

FILE NUMBER  
127671-903

February 24, 1998

Ms. Melissa Hurd  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Re: Federation of American Health Systems Political Action Committee - January, 1998 Report (12/1/97-12/31/97)

Dear Ms. Hurd:

This is in response to your letter dated February 18, 1998, addressed to Sylvia Ulrich, Treasurer of the above-referenced organization ("FedPac").

Your first inquiry addresses whether the receipt of a \$35,350 check from Tenet Healthcare Corporation PAC (the "Tenet PAC") in December 1997 exceeded the \$5,000 per person annual contribution limit. I believe it did not since the FedPac January report inadvertently miscategorized this contribution as having been received directly from the Tenet PAC. In fact, these amounts were actually individual contributions sent to the Tenet PAC but which were earmarked for FedPac. I have enclosed a list of these donors and the amount of their earmarked contributions for your review. The retribution rules contained in 11 CFR § 110.1(k) permit these contributions to be treated as if they had been made directly to FedPac.

ESTABLISHED 1842

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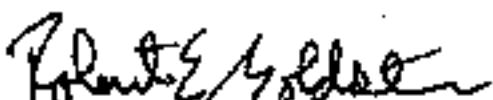
FOLEY & LARDNER

Ms. Melissa Hurd  
February 24, 1998  
Page 2

I have also enclosed a revised Detailed Summary Page reflecting the correct amount shown on Line 21 for FedPac's January, 1998 month report reflecting December 1997 activity.

Please call me if you have any further questions regarding these matters.

Sincerely,

  
Robert E. Goldstein

REG:pab  
Enclosures

REG\LETTER\234041.1

**REPORT OF RECEIPTS AND DISBURSEMENTS**

For Other Than an Authorized Committee  
Summary Page

1. NAME OF COMMITTEE (in full) <b>FEDERATION OF AMERICAN HEALTH SYSTEMS POLITICAL ACTION COMMITTEE</b>	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1111 19th Street N.W., Suite 402	
CITY, STATE and ZIP CODE Washington, D.C. 20036	

RECEIVED  
FEDERAL ELECTION COMMISSION  
COMMISSIONER

Mar 24 [Z] 31 PM '98

2. FEC IDENTIFICATION NUMBER CD00002281
3. <input type="checkbox"/> This committee has qualified as a multicandidate committee. (See FEC FORM 3B)

**4. TYPE OF REPORT**

- (a)  April 15 Quarterly Report  
 July 15 Quarterly Report  
 October 15 Quarterly Report  
 January 31 Year End Report  
 July 31 Mid Year Report (Non-election Year Only)  
 Termination Report

## Monthly Report Due On:

- February 20  June 20  October 20  
 March 20  July 20  November 20  
 April 20  August 20  December 20  
 May 20  September 20  January 31

- Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
 election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirteenth day report preceding following the General Election  
 on \_\_\_\_\_ in the State of \_\_\_\_\_

(b) Is this Report an Amendment?  Yes  No

**SUMMARY**

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Covering Period 12/01/97 through 12/31/97	\$ 0.00	\$ 102,102.84
8. (a) Cash on Hand January 1, 1997	\$ 65,094.40	\$ 102,102.84
(b) Cash on Hand at Beginning of Reporting Period	\$ 65,094.40	\$ 102,102.84
(c) Total Receipts (more Line 1b)	\$ 35,517.60	\$ 137,619.24
(d) Subtotal (add Lines 8(b) and 8(c) for Column A and Lines 8(b) and 8(d) for Column B)	\$ 100,612.20	\$ 166,137.28
7. Total Disbursements from Line 8D	\$ 6,000.00	\$ 90,625.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 8(d))	\$ 94,612.20	\$ 94,612.20
9. Debts and Obligations Owed TO the Committee Itemize all on Schedule C and/or Schedule D	\$ 0.00	\$ 0.00
10. Debts and Obligations Owed BY the Committee Itemize all on Schedule C and/or Schedule D	\$ 0.00	\$ 0.00
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.		

Type or Print Name of Treasurer

SYLVIA URNICK

For further information contact:  
Federal Election Commission  
999 E. Stree, NW  
Washington, DC 20463  
Toll Free 800-424-6520  
Local 202-219-3420

Signature of Treasurer

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

**FEC FORM 3X**

(Revised 8/93)

**DETAILED SUMMARY PAGE****OF RECEIPTS AND DISBURSEMENTS:****PAGE 2, FEC FORM 3X**

[revised 1/1/91]

NAME OF COMMITTEE	REPORT COVERING PERIOD	
	FROM: 12/01/87	TO: 12/31/87
	COLUMN A Total This Period	COLUMN B Calendar Year
<b>I. Receipts</b>		
11. Contributions (other than loans from:		
a. Individual Persons Other Than Political Committees		
i. Itemized (use Schedule A) .....	100.00	28,680.00
ii. Unitemized .....		206.00
iii. Total .....	100.00	28,686.00
b. Political Party Committees .....		
c. Other Political Committees (such as PACs) .....	25,360.00	49,732.00
d. Total Contributions .....	(add a, b and c) ►	25,460.00
12. Transfers From Affiliated/Other Party Committees .....		
13. All Loans Received .....		
14. Loan Repayments Received .....		
15. Others To Operating Expenditures (Refunds, Referrals, etc.) .....		
16. Returns of Contributions Made to Federal Candidates and Other Political Committees .....		
17. Other Federal Receipts (Dividends, Interest, etc.) .....	87.80	2,408.24
18. Transfers from Nonfederal Account for John Activity .....		
19. Total Receipts .....	(add 11d, 12, 13, 14, 15, 16, 17, and 18) ►	35,617.80
20. Total Federal Receipts .....	(Subtract line 18 from line 19) ►	35,617.80
<b>II. Disbursements</b>		
21. Operating Expenditures:		
a. Shared Federal/Non-Federal Activity (from Schedule H4)		
i. Federal Share .....		
ii. Non-Federal Share .....		
b. Other Federal Operating Expenditures .....		1,761.08
c. Total Operating Expenditures .....	(add a i, a ii, and b) ►	1,761.08
22. Transfers to Affiliated/Other Party Committees .....		
23. Contributions to Federal Candidates/Committees and Other Political Committees .....	6,000.00	69,721.00
24. Independent Expenditures (use Schedule E) .....		
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441(d)) (use Schedule F) .....		
26. Loan Repayments Made .....		
27. Loans Made .....		
28. Refunds of Contributions To:		
a. Individual Persons Other Than Political Committees .....		
b. Political Party Committees .....		
c. Other Political Committees (such as PACs) .....		
d. Total Contribution Refunds .....	(add a, b and c) ►	
29. Other Disbursements .....		3.00
30. Total Disbursements .....	(add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) ►	6,000.00
31. Total Federal Disbursements .....	(Subtract line 21a & from line 30) ►	6,000.00
<b>III. Net Contributions/Operating Expenditures</b>		
32. Total Contributions (other than loans) (from line 11d) .....	35,460.00	79,627.00
33. Total Contribution Refunds (from line 28d) .....	-0-	-0-
34. Net Contributions (other than loans) (from line 32 from 33) .....	35,460.00	79,627.00
35. Total Federal Operating Expenditures .....	(add line 21c i and 21b) ►	1,761.08
36. Credits to Operating Expenditures (from line 15) .....	-0-	-0-
37. Net Operating Expenditures .....	(Subtract line 36 from 35) ►	1,761.08

Embossed Tech-PAC Contributors

Jeffrey Barbakow, Chairman & CEO 1187 Coast Village Road Suite 1-166 Santa Barbara, CA 93108	\$3,000.00
Jiro Bilic, Senior Vice President 2204 Crown Knoll Lane Plano, TX 75093	\$1,500.00
Steve Blake, Vice President 823 Buckingham Place Danville, CA 94506	\$ 500.00
Norman S. Bebes, M.D. 3505 Gillespie, Apt. 2D Dallas, TX 75219	\$1,500.00
Stephen Brown, Senior Vice President 636 Oakdale Drive Plano, TX 75025	\$1,500.00
Scott Brown, Senior Vice President 885 Park Lane Santa Barbara, CA 93108	\$1,500.00
Thomas E. Casady, Vice President 4421 Knollview Plano, TX 75024	\$ 750.00
David S. Deerman, Vice President 4836 Holly Tree Drive Dallas, TX 75287	\$ 500.00
Alan Ewalt, Senior Vice President 396 Hot Springs Road Montecito, CA 93108	\$1,500.00
Michael Focht, Sr., President & COO P.O. Box 703 Santa Ynez, CA 93460-0703	\$3,000.00

MAR 13 '98 12:03 PM PLW# 3  
REC. CT. 999 1 7/10 7/10  
JUN 21, 1998 11:30AM TEXEL HEALTH ANNEX 1

310 557 8475 TO 919164427759 P.07/05  
\*\* 4 JUN 2001 10:11

Douglas Fritzsche, Vice President 2142 S. Catarina Circle Mesa, AZ 85202	\$ 500.00
Reynold J. Jennings, Senior Vice President 236 Evangeline Drive Mandeville, LA 70471	\$1,500.00
Dennis Jorgensen, Senior Vice President 3325 Paws Canyon Road Santa Ynez, CA 93460	\$1,500.00
Ben F. King, Senior Vice President 5724 Misty Breeze Drive Plano, TX 75093	\$ 750.00
Kenneth B. Love, Jr., Vice President 16 Ashron Mission Viejo, CA 92692	\$ 500.00
Thomas Mackey, Executive Vice President P.O. Box 834 Rancho Santa Fe, CA 92067	\$2,500.00
William Murray, Senior Vice President 10371 E. Desert Cove Avenue Scottsdale, AZ 85260	\$1,500.00
Karen Poole, Vice President 11555 N. 127th Way Scottsdale, AZ 85259	\$ 750.00
J. Scott Richardson, Vice President 2400 Piedra Drive Plano, TX 75023	\$ 500.00
Barry Schochet, Executive Vice President 5200 Keller Springs Road, #1212 Dallas, TX 75248	\$1,500.00
W. Randolph Smith, Executive Vice President 2908 Masters Circle Plano, TX 75093	\$2,500.00

MAR 13 '98 12:03 FR FLWA 3  
Rec'd. 20. FEB 98 2:41 PM FRA  
JAN 21, 1998 3:39 AM TEXEL HEALTH ANNEX 1

310 557 8475 TO 919164427759 P.28-128  
RJ. 210W. 2001 T. 8

* Neil Sorrentino, Senior Vice President 4440 Deer Ridge Road Danville, CA 94506	\$1,500.00
Don S. Steigman, Senior Vice President 837 N.W. 110th Avenue Coral Springs, FL 33071	\$1,500.00
Ed Tudanger, Senior Vice President 435 Laurel Chase Court Atlanta, GA 30327	\$1,000.00
Michael E. Tyson, Vice President 13917 St. Michael Drive Little Rock, AR 72211	\$ 500.00
Kenneth K. Westbrook, Vice President 33801 Blessington Lane San Juan Capistrano, CA 92675	\$ 750.00
Barry A. Wolfman, Vice President 20 Calleender Court Laguna Niguel, CA 92677	\$ 750.00
	<hr/> <u>\$35,350.00</u>

Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/>	Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/>	First Class Mail	POSTMARKED 3-16-98
<input type="checkbox"/>	Registered/Certified Mail	POSTMARKED
<input type="checkbox"/>	No Postmark	
<input type="checkbox"/>	Postmark Illegible	
<input type="checkbox"/>	Received from the House Office of Records and Registration	Date of Receipt
<input type="checkbox"/>	Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/>	Other (Specify):  <i>leb</i>	Postmarked and/or Date of Receipt
<input type="checkbox"/>	Electronic Filing	
PREPARER		DATE PREPARED 3-25-98